

# SNOW STAR FARM

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**May 18, 2021**

Jonathan A. Evans  
Presiding Officer  
New Hampshire Site Evaluation Subcommittee  
21 South Fruit Street, Suite 10  
Concord, NH 03301

## **RE: DOCKET NO. 2021-02 INVESTIGATION OF COMPLAINTS REGARDING THE ANTRIM WIND ENERGY FACILITY**

Dear Subcommittee Chair Evans,

Thank you for the opportunity to submit these comments in the above referenced matter before the SEC prior to the public meeting scheduled for May 21<sup>st</sup>, 2021.

I do not wish to file formal testimony at this time, but rather prefer to make several comments about the Antrim Wind facility and particularly about claims made by TransAlta and their attorneys regarding the operation of the Aircraft Detection Lighting System.

I am a resident of Antrim and have been involved in the proceedings of the wind turbine facility since it was first introduced to Antrim's Planning Board 12 years ago. My property and house are on the south side of Windsor Mountain, directly across from the Tuttle Hill Ridge. During much of the year, when the leaves are off the trees, I can see all nine turbines from my house. Being thus situated, the status of the aircraft lighting is constantly obvious to me. It was determined that the aircraft warning lighting required by the FAA on the wind turbines would not have an adverse effect on residents in the region **ONLY** if, by means of the ADLS, they were to remain off most of the time. Since Antrim is not in a congested fly zone and night time low-flying aircraft are very infrequent, the residents of Antrim expected, and were assured, that the flashing of the strobe lights would be a rare occurrence.

Since the lighting situation was an important and significant issue to both the residents of Antrim and the Appalachian Mountain Club, implementation of a working ADLS was written into contracts with AWE and the Certificate of Site and Facility, as being required **before** the project commenced commercial operation and necessary for its continued operation. The FAA requires hazard lighting on all structures over a certain height for the protection of nearby aircraft, but that lighting is not at all necessary if no aircraft are in the vicinity. If the strobes continue to flash when no aircraft are around, the lighting then becomes an annoyance and a burden to residents in the area.

Living on the hill directly across from the turbine facility, it is easy for me to observe the operation of the lighting during the night. During the entire year of 2020, I noticed that the strobe lighting seemed to be flashing far more often than it wasn't. Starting around the beginning of this year, January 1<sup>st</sup>, 2021, I decided to take note of how often the lights were on, and how often they were not. At my age, in my early 70s, I often am awake at night, so there are ample and frequent opportunities for me to observe the lighting. At first I was noting the status of the lighting and the time of night. But it did not take long for me to notice that the lights were on and flashing almost all the time, no matter what day it was or what time of night it was. Usually I'd see the lights flashing at dusk as the sun was setting, still flashing whenever I looked during the night, whether at 10pm, midnight, 2am, or 4am, and they would still be flashing at dawn as the sun was starting to rise. In fact, since early January until the end of April, when TransAlta sent an email admitting that the ADLS was not functioning properly and wouldn't be for another month, the times I observed the strobes **OFF** numbered only in the single digits.

Notwithstanding TransAlta's and Terma's descriptions and reports on the status of the ADLS, I have been able to observe what I observed. Unlike issues with turbine noise, no special measuring equipment or trained experts are necessary to determine if the aircraft hazard lighting is on or if it is not. Almost **EVERY** time I looked during the night, any time, any night, the lights were flashing. On the rare occasion that I observed that the lights were off, I often found that within five to ten minutes they would be flashing again. There were times when I would have traveled to Concord during the day and returned after dark and was keenly aware that I could watch the flashing strobes of the Antrim Wind turbines on the horizon from more than 20 miles from home.

The entire purpose of the ADLS is to avoid polluting the night sky with strobe lights. That was such a concern that it the ADLS was written into the Certificate as a condition of operation. The fact is that the lighting on Antrim Wind's turbines is, and has been, virtually since commencement of operation, **on all night**. The times when they have turned off were rare and far between. It is very difficult for me to pay any credence to TransAlta's or their attorney's claims about the ADLS working properly. All one needs to do is look up at the turbines at night. Over the last year or more, about 95% of the time that would show the lights on and flashing. Clearly, that should amount to being a repeated, habitual violation of the conditions of the Certificate, and a breach of the contract between AWE and the AMC. The SEC was informed on numerous occasions of this yet has never taken any action to address or correct it, let alone penalize Antrim Wind for the violation. The present subcommittee has the opportunity to act to enforce Certificate compliance, but this would only have significant impact and benefit for the welfare of Antrim residents if action is prompt and effective. Violations have been occurring constantly, attention has been brought to this fact repeatedly, and now it is time to act and have the SEC fulfill its defined function of protecting the best interests of the State of New Hampshire.

Sincerely,



Richard Block  
**SNOW STAR FARM**